



Gravesham Borough Council

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Kent
DA12 1AU

Highways and Transportation

Kroner House
Eurogate Business Park
Ashford
TN24 8XU

Tel: 03000 418181

Date: 17 June 2025

Our Ref:

Application - GB/20250318

Location - Garage Site Adjacent To 33, Empress Road, Gravesend, Kent

Proposal - Erection of a new residential building comprising of 5x 1 bed flats, 4x 2 bed flats and 1x 3 bed flats contained within a terraced style block.

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

I have concerns regarding the level of parking provided for this proposal. 5 parking spaces are proposed for 10 flat units (including one 3 bed) plus the potential loss of 15 garage spaces.

Firstly I would require confirmation that all of the existing garages are no longer in use and have deteriorated to such an extent that re-use is not a viable option. This is an area where parking stress levels are high and the loss of the garages, if still in use, would exacerbate the matter.

Secondly, I would request full justification of why only 50% of flats are needed. Whilst this is a relatively sustainable location with a good level of bus services available nearby and within cycling distance of Gravesend town centre, I do not consider this to be in a town centre location. There do not appear to be any parking restrictions in the local roads. Further information should be provided as to how the 5 parking spaces would be allocated amongst the 10 flats.

Thirdly, the access onto Empress Road would require adequate visibility, both for vehicles and, more particularly, pedestrians. Due to the narrowness of the road I would expect traffic speeds to be low, say 20 mph, requiring visibility splays from the access of 25m x 2.4m in both directions with no obstructions above 600mm. In addition, pedestrian visibility splays of 2.0m x 2.0m from the back of the footway along both sides of the access with no obstructions above 600mm. Both these visibility splays should be shown to be achievable on a plan.

Fourthly, the access and design statement states that 10 covered and secure cycle parking spaces will be provided (one per flat) which complies with KCC standards. However, these spaces do not appear to be shown on the submitted drawings and should be added.

I therefore request a hold objection be placed on this application until the above issues have been satisfactorily addressed, probably in a brief Transport Statement.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Yours faithfully

Director of Highways & Transportation

*This is a statutory technical response on behalf of KCC as Highway Authority. If you wish to make representations in relation to highways matters associated with the planning application under consideration, please make these directly to the Planning Authority.